REPORT ON THE PUBLIC REVIEW OF THE BLIND PERSONS' RIGHTS ACT

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EXECUTIVE SUMMARY

INTRODUCTION

This report is based on the public review of the *Blind Persons' Rights Act* (BPRA) as ordered by the Honourable Gene Zwozdesky, Minister of Community Development, in early October 2001 and chaired by Harley Johnson, former Alberta Ombudsman. The purpose of the review was to determine how to strengthen protection for those persons who rely on assistive animals, such as guide dogs, and whether to revise or replace the BPRA to achieve this objective. The report describes the reasons for the review, the methodology used and the findings. As well, it presents the Chair's recommendations to the Minister for consideration.

Albertans with a visual disability are protected from discrimination by two acts: the *Human Rights, Citizenship and Multiculturalism Act* (HRCMA) and the *Blind Persons' Rights Act* (BPRA), both of which are administered by Community Development. The 1980 BPRA governs the use of a white cane and a guide dog, defined as: "a dog trained as a guide for a blind person and having the qualifications prescribed by the regulations."

The Act has been problematic since its introduction, partly because supporting mechanisms were either not put in place or not maintained. For example, the regulations intended to provide accreditation and assurance that guide dogs are well trained have not been updated since 1986, and a list of reputable training institutions has not been maintained.

METHODOLOGY

Public Consultation

In planning and conducting the review, every attempt was made to ensure the participation of a wide range of "stakeholders." A discussion paper and other background materials were provided in several formats; the review was widely publicized; and submissions were accepted in writing, or verbally by telephone and tape cassette. Over 300 submissions were received.

The Chair held focus groups in five centres around the province to hear the opinions of people with disabilities and organizations representing their interests; users and trainers of assistive dogs; representatives of the business community; providers of services such as taxis and public transit; law enforcement agencies; government officials and members of the public. A total of 74 people attended these groups.

The Chair also had discussions with other groups or individuals having a special interest in or knowledge of the issues. Examples include the Canadian National Institute for the Blind (CNIB), the Alberta Committee of Citizens with Disabilities, andTaxi Commissions.

Research

Over the course of the review, the Chair conducted other research, including attending the Fourth National Dog Guide Conference in Burnaby, B.C.; searching the Internet for information related to service animal training and accreditation, standards, and legislation; and reviewing related legislation from Alberta, other provinces and the United States.

KEY FINDINGS

Focus Groups

While there are reports of persons accompanied by an assistive animal being refused service, particularly by taxi drivers, restaurants and providers of rental accommodation, generally, guide dog users experience few problems. Lack of public awareness is perceived to be the greatest barrier to access.

Persons with assistive animals needed for hearing, mobility or other disability requirements are more likely to be denied access because the public is less familiar with animals used for these purposes and because they have no legal entitlement to access. Therefore, these people want to see legislation extended to cover all assistive animals, as do personnel from dog training schools.

The type of animal being referred to must be trained to perform a specific service or services which an individual needs because of his or her disability. In other words, the distinction lies not in the disability, but in the service the animal provides.

Businesses or service suppliers have trouble distinguishing a guide dog from an assistive dog, but, while reluctant to admit pets, are supportive of the potential expansion of legislation to other assistive animals, providing appropriate standards and certification are in place. Several focus group participants suggested issuing a photo identification card as a way of making it easier for a service supplier to distinguish an assistive animal from a pet.

Participants in the focus group identified certain values and principles as needing to guide the legislative review. These include balancing the rights of the dog handler with those of other people, recognizing that dog handlers have responsibilities associated with the behaviour of their dog, and ensuring that no one with a disability is worse off as a result of any changes to legislation.

Submissions

The Canadian National Institute for the Blind developed a position regarding the BPRA review and urged its constituents to support that position. The position was that the BPRA remain a stand-alone piece of legislation, but be expanded to guarantee the right of every student who is blind, visually impaired or deaf-blind, to receive Braille materials and qualified classroom education in Braille. Approximately 60 percent of the submissions supported the CNIB position in whole or in part.

Many of the points in the other submissions supported the ideas from the focus groups, particularly with regard to broadening the legislation to provide persons with disabilities who use assistive animals the same rights to access as have persons who are blind and use guide dogs.

Research

Ontario has a *Blind Persons' Rights Act* very similar to Alberta's, which ensures that blind people dependent on guide dogs are granted entry to any public place and are provided with all services available to the general public. An identification card can be obtained from the Attorney General's office and used as proof that the person is entitled to be accompanied by a guide dog.

Under the 1996 *Guide Animal Act* of British Columbia, a person with a disability may apply for a certificate as evidence of his or her need for a guide animal. In late 1999, the British Columbia government proposed expanding the scope of this Act by introducing a new *Assistance Animal Act* describing the services and facilities available for public access and the types of assistance animals to be covered. The government began seeking responses from stakeholders; however, the proposal did not get passed into legislation.

The United States *Americans with Disabilities Act* (ADA) uses the term "service animal", defined "as any guide dog, signal dog or other animal individually

trained to provide assistance to an individual with a disability". Under the ADA, businesses or service suppliers may ask the person who has the animal if it is a service animal required for the person's disability. It is not permissible to require documentation or proof of state certification as a condition of providing service.

Proposed Legislative Framework

The report describes a legislative framework to address the issues raised in the public review. The key issues were:

- broadening legislation to include other assistive animals in addition to guide dogs
- improving the awareness of the public and service supplies of the need for assistive animals
- introducing processes to ensure assistive animals are trained to a high standard and that service suppliers have some way of distinguishing certified dogs from "pets"
- improving the complaint and resolution processes to make them more timely and to deter repeat offences.

RECOMMENDATIONS

The report recommends that the Minister of Community Development:

1. Retain the *Blind Persons' Rights Act* with the following amendments:

    - Revise and update the definition of blindness by removing the references to Alberta government pension and the CNIB.

    - Remove references to guide dogs.

    - Increase current fines for misuse of a white cane.

Rationale:

The definition of blindness would be consistent with other jurisdictions.

Protection is preserved for persons using a white cane.

The BPRA can be added to in future if blind persons are awarded more rights.

The provisions governing the use of a guide dog are more efficiently administered in a single piece of legislation that applies to all assistive animals.

2. Develop a new piece of legislation called the *Assistive Animals Act*, features of which include:

   - A definition of assistive animals, similar to the one developed by the Coalition of Assistance Dog Organizations, which refers to animals "specifically trained to perform physical tasks to mitigate an individual's disability and includes guide dogs, hearing dogs, and service dogs, but not animals for comfort, protection or personal defense".

   - Regulations referring to:

     - an Assistive Animals Council made up of paid staff responsible for administering the legislation
     - an volunteer advisory committee, consisting of members appointed by the Minister of Community Development to represent a cross-section of stakeholders, with the primary role of offering information to guide the decisions of the Council
     - a photo identification card which is intended to facilitate access and issued to the team (user and animal) based on successful completion of a test and the demonstrated ability to meet specific criteria

- a complaint and enforcement process wherein the Council advises complainants, conducts investigations within a specified time, and seeks a mediated solution wherever possible

- Provision for a complainant or the Assistive Animals Council to assist in laying charges against a person or organization denying access to an assistive animal

- Fines to be levied against a service supplier for denying access to a certified assistive animal

- A clause indicating that the legislation will be reviewed in five years as a way of monitoring its effectiveness and ensuring the legislation remains current, particularly with regard to the definition of assistive animal

The power to establish and amend the regulations rests with the Minister of Alberta Community Development on the advice of the Assistive Animals Council.

Rationale:

The proposed legislation responds to the increased use of assistive animals by people with a disability and their need for access to public and commercial places and services when accompanied by their animals.

The proposed legislation strengthens protection for **all** persons with disabilities who use an assistive animal.

The use of volunteers on the advisory committee gives a voice to stakeholders and helps to ensure the regulations are relevant and workable.

The emphasis is on public education and training (see below) and mediation; however, there is

provision for bringing charges in extreme cases or with repeat offenders.

3. Design and implement a public education campaign with the purposes of heightening public awareness of the need for assistive animals; informing Albertans of the changes to the legislation; and advising service suppliers, users of assistive animals and animal trainers of their respective responsibilities under the law.

4. Amend the *Human Rights, Citizenship and Multiculturalism Act* and other provincial acts to incorporate "assistive animal" as appropriate.

5. As a first step in implementation, appoint an interim director to establish the Assistive Animals Council and the Advisory Committee and put the procedures in place.

   Once this is completed, hire a permanent director using a process that involves the Advisory Committee.

6. Advise the Minister of Learning of the findings of this public consultation with regard to Braille rights: the wish for persons who are blind to have access to educational and other materials in Braille and classroom teaching by a certified teacher of Braille.

REPORT ON THE PUBLIC REVIEW OF THE BLIND PERSONS' RIGHTS ACT

BACKGROUND

INTRODUCTION

In Alberta there are two acts to protect persons with a visual disability from discrimination: the *Human Rights, Citizenship and Multiculturalism Act* (HRCMA) and the *Blind Persons' Rights Act* (BPRA). Alberta Community Development administers the HRCMA and recently assumed responsibility for the BPRA.

Individuals and organizations speaking on behalf of people who are blind have raised concerns about the BPRA. In June, 1999, a director on the Board for the Canadian National Institute for the Blind for Alberta and the NWT wrote to the Honourable Premier Ralph Klein saying that the CNIB had been shuttled between government departments, and that due to a lack of public awareness of the law, people were being denied access to public places and refused housing and taxi service because of their guide dogs.

In October 2001, the Honourable Gene Zwozdesky, Minister of Community Development, ordered a public review of the BPRA and contracted Harley Johnson, the former Alberta Ombudsman, as chair. Mr. Johnson's mandate was to determine how to strengthen protection for those persons who rely on assistive animals, such as guide dogs, including whether to revise or replace the BPRA to achieve this objective.

The review involved significant research, requests for submissions, and province-wide consultations with persons with disabilities, their families and organizations representing their interests; users and trainers of service dogs; the business community; providers of public services; educators; law enforcement agencies; and members of the public. This report describes the review process and findings and presents the Chair's recommendations to the Minister for consideration.

THE LEGISLATION

The 1996 *Human Rights, Citizenship and Multiculturalism Act* lays out a code of conduct with respect to publications, notices, goods and services, accommodation and facilities, tenancy and employment whereby discrimination is prohibited against persons in a number of classifications including physical disability. Physical disability is defined as: "any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes epilepsy, paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, and physical reliance on a guide dog, wheelchair or other remedial appliance or device."

The 1980 *Blind Persons' Rights Act* (BPRA) refers specifically to the use of a white cane and a guide dog. It defines a blind person as someone who is "registered as blind with the Canadian National Institute for the Blind, or who, on account of blindness, receives a pension from the Government of Alberta, or who is certified by a qualified eye specialist as having not more that 6/60 vision according to Snellen's Chart in the better eye after correction with glasses."

The BPRA defines a guide dog as: "a dog trained as a guide for a blind person and having the qualifications prescribed by the regulations." The regulations referred to are the Guide Dogs Qualifications Regulations introduced in 1980 to support the Act.

REASONS FOR THE REVIEW

The *Blind Persons' Rights Act* has been problematic since its introduction, partly because mechanisms to support the legislation were either not put in place or not maintained. For example, the Guide Dogs Qualifications Regulations were intended to provide accreditation and assurance that guide dogs are well trained. The regulations require an owner of a training school to apply to the government to be included in a list of qualified institutions; however, there is no subsequent accreditation, monitoring or evaluation process to determine whether the school is current or acceptable standards are being met. Furthermore, the regulations have not been updated since 1986, and the list of reputable institutions has not been maintained. This means that any person using a dog that has not been trained by one of the institutions on the list is not protected by the BPRA.

The mechanism supporting identification is also missing. Section 6 of the Act states that the Canadian National Institute for the Blind may, on application, "issue to a blind person an identification card identifying the blind person and his guide dog." However, the CNIB indicates it was not consulted over this matter and has never issued such a card.

The misperceived redundancy of the BPRA and the *Human Rights, Citizenship and Multiculturalism Act* creates more issues. They include the following:

- **Duplication**. Blind persons are protected by two pieces of legislation. In addition to the BPRA, the HRCMA protects persons who rely on a guide

dog. The HRCMA also protects people who have a disability other than blindness. It can be difficult to decide which act applies.

- **Enforcement.** Some police agencies and some prosecutors are reluctant to act on complaints made under the BPRA due to comparable provisions under the HRCMA.

- **Timeliness**. Under the HRCMA, the time needed to resolve complaints is dependent upon the complexity of the individual case. Some cases are resolved very quickly, while others may take longer. The reluctance to use the BPRA means some issues never get resolved.

- **Currency**. In recent years, persons with disabilities have begun to rely on other animals that are trained to perform functions other than guiding and tasks suited to a wide range of disabilities. These assistive animals can, for example, alert persons with hearing impairments, pull wheelchairs, assist with balance, or carry items for persons with mobility impairments. Guide dog is the only animal referred to in the BPRA and the HRCMA.

Since 1980, four private members' bills have been tabled proposing amendments to the *Blind Persons' Rights Act* without success. The most recent of these was the 2000 Bill 219, an *Amendment Act* put forward by Rob Lougheed, MLA for Clover Bar-Fort Saskatchewan.

This amendment proposed broadening coverage to add deaf person to the definition "person[s] with a disability". Bill 219 also substituted the words "service dog" for "guide dog".

The bill received first reading, but lapsed on the Legislature's Order Paper. Its discussion by a Social Policy Committee of the government's caucus indicated support for extending coverage to service dogs, but not to all animals.

CONTEXT

NUMBERS AFFECTED BY BPRA

The office of the Canadian National Institute for the Blind in Edmonton estimates that approximately two percent of the Institute's constituents use a guide dog, or about 100 people in Alberta. This is considered an underestimate since not all people who are blind register with the CNIB.

It is not known how many Albertans use an animal to assist with functions other than guiding.

COMPLAINTS INVOLVING ASSISTIVE DOGS

Alberta Justice advises that no charges have been issued under the BPRA in the past three years.

An informal review of complaints to the Human Rights and Citizenship Commission (HRCC) between 1999-2001 turned up nine files where complaints involving assistive dogs had been made and dealt with. In seven of the complaints, people had been refused service, and in two they were refused tenancy. Eight of these complaints were on the grounds of physical disability, and one was on the grounds of mental disability.

The service complaints included being denied taxi service, access to social activities, a seat on a tour bus, a seat on a bus line and service in a restaurant. Settlement terms were reached through conciliation in these seven cases. In five of the cases, the respondent agreed to change its policy on assistive dogs.

In the two complaints about tenancy, one person was denied accommodation because of a guide dog and another was evicted for the same reason. In both cases, financial settlements were reached subsequent to the investigation.

The amount of time between the file being opened and closed in the service complaint cases ranged from one day to 79 days. Two were closed in one day and one in six days. The number of days required in the four others was 36, 53, 52 and 79 days. The time required to close the two files relating to tenancy was 102 days and 434 days.

Direction of the Alberta Government

In the past ten years, the Alberta government has been taking steps to improve government efficiency by getting out of "the business of business." The move began in 1993 with the privatization of retail liquor stores and the private sector delivery of motor vehicle licensing and associated regulatory services. Through the late '90s, every government ministry was required to conduct a regulatory review with the objectives of removing unnecessary regulation, implementing user fees or increasing private sector participation as appropriate.

In a more recent related move, the government delegated regulatory powers to various trade and professional councils, such as the Alberta Insurance Council and the Alberta Motor Vehicle Industry Council. The councils serve as self-regulatory bodies with the authority to grant licenses to business or practitioners within their industry and to investigate complaints.

Also in the interests of efficiency, and again with the idea of putting decision-making into hands at the local level, the government decentralized or regionalized services and developed new authorities with separate power and control over their own budgets. The regional health authorities, Children's Services and the Provincial Persons with Developmental Disabilities Board are examples.

Throughout this process, the Alberta government has consulted with its various constituents and the public to ensure that all interests are heard.

The consultation for the review of the BPRA was consistent with provincial government direction, and the legislation amendments must be likewise.

THINKING IN THE DISABILITY COMMUNITY

Increasingly, people with a disability and the organizations that represent them are promoting an objective where persons with disabilities are full participants in society. People with a disability, like anyone else, are willing to take on the many roles and obligations of responsible citizenry and are capable of doing so. Access may be the starting point, but empowerment is the key to full participation: people with a disability no longer want to be merely "protected" or to have decisions made for them.

However, the objective can only become a reality if people with disabilities receive the respect and recognition they deserve, if accommodations are made toward equity, and if information and opportunities to make decisions that shape their lives are available. In other words, there must be changes in society's attitudes and institutions, not only in legislation and regulation.

There is an opportunity in shaping new and/or existing legislation to further this objective for people with a disability. Everything must be done to increase their efforts towards full participation and to avoid assumptions that reflect paternalism or devalue their abilities.

METHODOLOGY

CONSULTATION PROJECT TEAM

Community Development set up a Consultation Project Team to guide the review, with Harley Johnson as Chair. The team was asked to review materials and offer advice related to the discussion paper and other documents, the communication strategy, the selection of focus group members, and the outline and draft of this report.

Members came from the Human Rights and Citizenship Commission, Communications and other divisions of Alberta Community Development, Alberta Justice and Attorney General, and the Premier's Council on the Status of Persons with Disabilities. There were also two facilitators and an administrator from Community Development and an independent consultant who assisted with the writing of the discussion paper and report.

COMMUNICATION IN SEVERAL FORMATS

The public consultation was launched with a news release issued on October 29, 2001. Reference was made to a discussion paper that had been prepared to inform interested individuals and organizations about the review and the reasons for it. The paper also offered options for consideration and questions for deliberation and debate.

The discussion paper and news release were made available in regular print, large print, audio and a low literacy format. They were also available in HyperText Markup Language (HTML) through a special BPRA website. Internet users were connected to the site through an icon on the Community Development home page. Telecommunication and teletype devices for people who are deaf or hard of hearing (TDD/TTY) were also available through a toll-free number. The discussion paper was also made available in Braille.

Almost 600 people visited the BPRA website between the beginning of November and mid-December 2001.

Advertising

Advertisements encouraging Albertans to provide submissions to the review were placed in seven provincial daily newspapers on November 1, 2001. A similar advertisement was placed in an aboriginal newspaper, *Alberta Sweetgrass*, the following week. The review was advertised by radio in Edmonton and Calgary, province-wide on CKUA, and by VoicePrint, the broadcast network for people who are blind.

Alberta Community Development sent the news release and the discussion paper to other ministries, related agencies and Members of the Legislative Assembly at their legislative and constituency offices.

Submissions

Arrangements were made for people to respond by mail, e-mail, fax, tape cassette or telephone. The toll-free RITE line was advertised and operators were alerted to the review. The RITE line technology is able to link persons with a hearing disability to any government ministry.

More than 350 submissions were received.

Focus Groups

Between November 9 and December 3, 2001, focus groups were held in Grande Prairie, Edmonton, Red Deer, Calgary and Lethbridge. A total of 74 people attended. Their names are appended to this report.

Participants were invited based on their knowledge and experience with service animals (guide dog user, service animal trainer), their experience living with a disability or representing persons with disabilities, or because their work or service stands to be affected by changes to the legislation (taxi drivers, public transit managers, restaurateurs, police, public servants, hotel/motel operators). In addition, five members of the public were randomly selected from the telephone book for each session. All invitees were sent an information package that included the discussion paper.

Media Relations

A media advisory was issued in advance of each focus group inviting the media to interview the Chair of the review and any interested focus group participants. At the outset of each focus group the Chair announced that the media would be present at the end of the session and that he would be speaking with them about the review and what he had heard that day. He invited focus group participants to speak to the media as well.

At least two MLA columns were published in local newspapers describing the review. Community Development requested and obtained coverage on feature programs such as VoicePrint and The Rutherford Show, a province-wide radio show.

Twenty-three different electronic or print media filed reports. Details of the outlet, the location, the reporter and the date are appended.

Interviews and Special Meetings

The Chair of the Public Review interviewed several individuals and attended special meetings of organizations representing "stakeholder" groups, including persons with disabilities, the CNIB, Taxi Commissions, and members of the Alberta Hotel and Lodging Association. The purpose was to seek technical information, clarify issues, validate ideas, and request positions of service provider stakeholders unable to attend the focus groups or other meetings. A list of the names of the organizations and individuals consulted this way is appended to the report.

Research

Over the course of the review, the Chair conducted significant research in person or via the Internet. The research activities included:

- Attending the Fourth National Dog Guide Conference in Burnaby B.C. in October 2001
- Searching the Internet for websites or information related to service animal training and accreditation, standards, and legislation
- Reviewing related Alberta legislation as well as legislation from other provinces and the United States

FINDINGS AND OBSERVATIONS

Focus Groups

Participants' Experiences

At the start of each focus group, participants were asked about their experience with guide dogs or service animals. The themes that emerged were generally similar and included the following:

- Problems with access are most likely to occur when persons with a visual impairment who have a guide dog wish to take a taxi.
- Lack of public awareness is perceived to be the greatest barrier to access.
- Complaints are not being filed under the BPRA.
- Dog training schools and users of dogs for purposes other than guiding want coverage extended to assistance dogs.
- Most participants expressed concern about extending coverage to all animals and purposes, such as therapeutic purposes (comfort, companionship). The emphasis should be on dogs.
- Training schools usually require a team (dog and handler) to travel to the school to receive certification, which is not always possible.

Key Values and Principles

One of the first focus group exercises involved asking participants about the values and principles that should guide the Chair's review and recommendations.

The most frequently mentioned values and principles were:

- The need to balance the rights of the dog handler with the rights of other people, for example, where religion or health is involved

- The need to recognize that dog handlers have responsibilities associated with their use of services and the behaviour of their dog
- The need for a single, simple process of complaint
- The need to balance punitive and restorative forms of justice
- The need for the disability community to be united through commonly-accepted solutions
- The need to make public awareness a higher priority
- The need to treat all persons with a disability fairly, by not singling them out by disability or putting them into competition with others
- The need to ensure that any amendments proposed will not reduce or erode the rights of persons who are blind; that no one is" worse off" as a result of the changes
- The need to avoid a litigation-based model

Key Suggestions

Participants broke into small groups to identify and discuss the issues and potential solutions. Each small group made suggestions relative to their discussion. These were read out when the larger group reconvened.

The key suggestions were:

- That the BPRA be extended to include other assistive dogs
- That the BPRA be retained, and a second piece of legislation introduced, to cover other assistive dogs
- That the animals and disabilities covered by the legislation be clearly defined
- That standards and an accreditation process be introduced for dog training schools
- That a delegated authority be responsible for standards, school accreditation, and monitoring;
- That additional schools to the ones on the current list be accredited
- That there be a process for identifying authorized animals and/or owners

- That the legislation include provision for dogs in training
- That the legislation describe credible, realistic criteria so that suppliers of services are clear about which animals are entitled to access and under what conditions
- That suppliers of services be educated about their rights and obligations to persons with a guide dog or assistive animal
- That the responsibility for enforcement be clearly outlined
- That the fines for infringement be increased
- That the provincial government sponsor a public awareness campaign
- That a public education campaign be introduced aimed at improving acceptance of people with disabilities and that four specific groups be targeted: government, industry, services, and the community at large
- That public education about these issues start in the elementary grades
- That efforts be made to institute a national system of standards, training and accreditation for assistive animals
- That persons with a visual impairment be given legislated access to Braille education from a qualified teacher and to materials in Braille
- That changes be made to legislation to improve all forms of access for persons with disabilities (access to buildings, alternative forms of communication, etc.)

Submissions

Over 350 submissions were received. *The majority of these were written (letters or emails), but some were submitted by telephone or fax.

CNIB Position

When the review was announced, the Canadian National Institute for the Blind developed a position

* The approximately 50 submissions received after December 19 are not included in the analysis for this report; however, they are listed in the appendix.

regarding the BPRA and urged its constituents to contact the Premier or their MLA supporting that position.

The CNIB wants to see the BPRA remain a stand-alone piece of legislation. Their concern is that the debate about service animals may result in other "equally important issues" being lost. These include the definition of who qualifies as blind, the authorized use of a white cane, and access to Braille education and materials. For the CNIB, the legislative review offered a timely opportunity to request that the BPRA be expanded to guarantee the right of every student who is blind, visually impaired or deaf-blind, to receive Braille materials and qualified classroom education in Braille. Being granted this right would be a first in Canada.

The CNIB argues in favour of a separate act for animals providing services other than guiding, since if all assistive animals are included in the BPRA, its focus may change and provisions unique to blindness, such as access to Braille, may not be accepted by the government.

In defining who qualifies as blind, the CNIB position is that the definition should apply to anyone *with a visual acuity of 20/70 or less with a visual field restriction of 20 degrees or less in the best eye with corrective lenses*.

With regard to the Human Rights and Citizenship Commission, the CNIB acknowledges that the Commission does protect the rights of people with a disability; however, it maintains that the Commission's hearing process is limited by not taking place in a court of law. Retaining the BPRA as a stand alone piece of legislation would give the blind community a choice between pressing charges through the courts or resolving differences through the Alberta Human Rights and Citizenship Commission.

The CNIB also makes recommendations about enforcement and administration of the Act, citing several reasons why the HRCC should not administer the BPRA:

- The HRCC is already overloaded and has long waiting times. The complaint process often takes years to resolve.

- History has shown that issues of discrimination and exclusion for blind people and their guide dogs have not always been satisfactorily resolved through the Human Rights and Citizenship Commission.

- The process of HRCC hearings is different from court hearings, and the rules of evidence are not as strict. Evidence that would not be acceptable in court can be presented (e.g. hearsay evidence).

- The HRCC process is set up to resolve differences through conciliation rather than to fine or punish offenders. Without the ability to fine, revoke a license or press charges, offenders may continue to discriminate against people who are blind, visually impaired or deaf-blind, and guide dog users.

- The rights of people who are blind, deaf-blind and visually impaired, including those who use a guide dog, should be interpreted by a judge in a courtroom. Fines and punishments should be appropriate deterrents.

The CNIB opts for enforcement falling under the *Provincial Offences Procedures Act*, with fines being increased up to $5,000. The CNIB proposes that, under the Act, "If personal safety or security is not at issue, the person would file a report with the police at the nearest station, and an investigation would follow. However, if personal safety or security is at issue, a call should be made to request the attendance of a police officer or special constable."

Support for CNIB Position

One hundred and seventy-five of the submissions (60%) received by December 19 supported the CNIB position in whole or in part. The rights to receive materials in Braille and access to Braille teaching were a key focus of these submissions.

Some people writing in general support of the CNIB position offered additional or alternative views:

- Leave the BPRA as it is.
- Each student with a visual impairment should receive an individualized assessment by an education specialist for the visually impaired to determine programming needs.
- A rural school division should not be placed in a position of financial hardship by having to hire a special Braille educator and purchase special materials to teach one visually impaired student. There should be at least five such students in a division before the division is obligated to meet this need.
- Teaching Braille would be detrimental to blind students and would add significantly to the cost of education. Blind students should continue to be placed in classrooms with other students so they are able to compete successfully and do not get the impression they are different.
- By not teaching Braille, the system is forcing students who are blind to be dependent on technology.
- Other people who are blind, besides students, would benefit from the teaching of Braille.
- Post-secondary fees should be waived for blind students.
- Institutions such as banks should be required to provide materials in Braille format (statements, deposit slips, etc.)

- The legislation should include lists of qualified guide dog schools.
- The Alberta government should be responsible for issuing identification cards that can be used by trainers of guide dogs.
- A board or committee should be set up to deal with complaints under the BPRA in a timely manner.
- There should be a toll free number where incidents can be reported.
- There should be separate legislation for each disability.
- Make the BPRA more enforceable and introduce stiffer penalties.
- The BPRA review should have focused on strengthening rights for persons who are blind or visually impaired, not on the use of assistive animals.
- Bring the BPRA under the umbrella of the Human Rights and Citizenship Commission and "beef up" the Commission's power.

Definition of Blindness

The position of the Alberta Division of the Canadian Council for the Blind is similar to that of the CNIB with the exception of its definition of blindness. The Council recommends that the current definition be unchanged – *visual acuity of 20/200 or less with a visual field restriction of 20 degrees or less in the best eye with corrective lens*. The reasons given for this recommendation are:

- The present definition is appropriate from the point of view of safety for persons using a white cane or a dog.

- Generally, the public has been educated to recognize and respond with consideration to those carrying a white cane or using a guide dog.

- If the definition were broadened, it would pertain to those who would not necessarily require that particular awareness, leading the public to begin to question or doubt the validity and meaning of the use of a white cane or guide dog.

- Retaining the current definition ensures the ongoing safety for people who absolutely rely on these terms.

In a conversation with a trainer of service dogs, it was pointed out that guide dogs are less effective when working with persons who have some visibility. This individual's recommendation was to retain the definition currently in the BPRA.

Key Points from Other Submissions

Many of the points made in the other submissions supported the ideas from the focus groups, but unique ideas were also put forward. The following are examples.

- Treaty 7 Tribal Council reports that First Nations people who reside on a reserve have difficulty getting assistance if they are blind. The CNIB is unable to provide equipment because Health Canada is responsible for residents on reserve; however, Health Canada does not supply the equipment needed.

Treaty 7 would also like legislation requiring the translation of materials in First Nations languages into Braille.

- All persons with disabilities requiring animal assistance should be included in a new act.
- That guide dogs in training be granted the same status as certified guide dogs.
- Assistance animals should be treated the same as guide dogs.
- The term "animals" should be defined more broadly than "dogs".
- The term "assistance animal" should not be used because of its broad and inclusive connotation, and in light of the absence of evidence that other animals can be reliably trained to provide the services needed while being accepted in places to which the public is invited.
- Heavy penalties for denying access to an animal would result in stricter adherence to the law.
- The Animal Control Section of the City of Edmonton supports introduction of a general category of assistive dogs into the provincial legislation. To register a dog as a guide dog, the City relies on the endorsement of recognized certifying organizations. Therefore the City strongly recommends a stipulation stating that to qualify for certification, an assistive dog must meet nationally or internationally recognized standards particular to the disability category for which it is trained.
- Public safety is an issue for service suppliers.
- Public services such as transit systems need someone with expertise to determine the legitimate use of an assistive animal.
- There are many technical and electronic devices to assist blind people in reading and writing.

These include a Braille printer working off a special tape.

- People with disabilities should decide what is needed, not the public.
- More government funding should be allocated to the education of all persons with disabilities.
- The Alberta government should take leadership in creating and facilitating alternative opportunities for persons with disabilities.

RESEARCH

Conference in British Columbia

The review Chair attended the Fourth National Dog Guide Conference in Burnaby B.C. in October 2001 where many people who use a guide dog identified the issues they face. Representatives from many guide dog schools were in attendance and were part of a trade show affording the opportunity to discuss issues of relevance with a number of people actively involved in the training of guide dogs. A number of the concerns were similar in nature to those raised at the focus group meetings in Alberta, particularly the problems of setting and maintaining standards. Another emerging concern for guide dog users was obtaining legislated protection from attacks by other dogs.

Review of legislation from other provinces

Ontario has in place a *Blind Persons' Rights Act* very similar to Alberta's. The Act ensures that blind people who depend on guide dogs are granted entry to any public place and provided with all services available to the general public. Anyone denying access or discriminating against a blind person on the basis of the guide dog may face a fine of up to $5,000. An identification card can be obtained from the Attorney General's office and used as proof that the person is entitled to be accompanied by a guide dog.

Unsuccessful attempts have been made to amend this 1980 Act.

British Columbia introduced the *Guide Animal Act* in 1996. In this Act a person with a disability is defined as "a person who is apparently blind or otherwise disabled and is dependent on a guide animal or white cane." Again in this province, the person with a disability may apply for a certificate to use as evidence of his or her need of a guide animal.

The Lieutenant Governor in Council may make regulations under the Act specifying which animals, or classes of animals, are guide animals and the conditions that must be met for an animal to become, or continue, to be a guide animal.

In late 1999, the British Columbia government proposed introducing a new *Assistance Animal Act* to expand the scope of the *Guide Animal Act* by describing all services and facilities available for public access and the types of assistance animals to be covered. A consultation package was developed, and the government began seeking responses from associations for people with disabilities and users and trainers of assistance dogs. In intent and content, the proposed Act is very similar to the one recommended in this report. However, the British Columbia proposal did not get passed into legislation.

Saskatchewan and Manitoba include persons with a disability in their respective *Human Rights Code*, both of which prohibit discrimination on the basis of reliance on an assistive animal. Saskatchewan uses the term, "service animal". Manitoba's legislation refers to dog guide or "other animal assistant."

Review of United States of America legislation

The United States *Americans with Disabilities Act* (ADA) uses the term "service animal", defined "as any guide dog, signal dog or other animal individually trained to provide assistance to an individual with a disability".
Two other pieces of United States federal legislation, the *Air Carrier Access Act* (1986) and the *Fair Housing Act* (1988), extend anti-discrimination

protection to persons using service animals. Sections of the ADA, such as Title I, administered by the Equal Employment Opportunity Commission, require making reasonable accommodations to increase access to employment and public accommodation for persons with a disability using a service animal. The training of service animals is not regulated by federal agencies.

Under the ADA, businesses or service suppliers may ask the person who has the animal if it is a service animal required for the person's disability. However, it is not permissible to require documentation or proof of state certification as a condition of providing service. In addition, people using service animals cannot be segregated from other customers.

Review of Alberta legislation

In a discussion about consumer protection between the Chair of the BPRA Public Review and a representative of Alberta Government Services, it was decided that the *Fair Trading Act* may provide protection for an Albertan buying or using an assistive animal. However, there are complications. The guide dog school, rather than the user, is usually the owner of the animal. Since most training schools are located outside of Alberta's jurisdiction, it may be difficult to conduct an investigation or lay a charge.

Several pieces of Alberta legislation will have to be amended if the definition of guide dog is replaced or another term, such as assistive animal, is introduced. The legislation includes the *Human Rights, Citizenship and Multiculturalism Act*, the *Residential Tenancy Act*, the *Innkeepers' Act*, and the *Food and Beverages Act*.

Search of Internet websites

Information is available from various websites. Users of the internet can find information about service

animals, models of legislation and prototypes of standards, ethics and tests for assistive dogs.

One particularly helpful website belongs to Assistance Dogs International, Inc. (ADI), a coalition whose members represent organizations and individuals that train and place assistance dogs. The goals of ADI are to improve the training, placement and use of these dogs. To this end, it establishes standards that its member organizations are expected to use.

ISSUES AND ANALYSIS

This section examines the issues and proposes a framework to answer to the question, "*How can protection be strengthened for people who use assistive animals?* "

The following were the key issues from the focus groups and submissions.

1. Some service suppliers deny access to blind people with guide dogs because they do not want dogs in their restaurant, hotel, taxi, etc.; and they do not understand their obligation under the law.

2. Actions suggested to address Issue #1 include: educating the public, providing the blind person and guide dog (the team) with some form of identification to facilitate access, and introducing a timely resolution process for infractions and heavy fines for repeat offences.

3. People with disabilities other than blindness who use assistive animals want the same protection under the law as is granted to blind people with guide dogs under the BPRA.

4. The type of animal being referred to must be trained to perform a specific service or services which an individual needs because of his or her disability. In other words, the distinction lies not in the disability, but in the service the animal provides. The identification process suggested in Issue #2 above would have to indicate that the animal is trained to perform the services the person needs, and that the two work as a team.

5. The definition to address Issue #4 must ensure that legislated rights are only extended to those individuals requiring bona fide animal assistance and not those simply wishing to have an animal's companionship. People with disabilities who must rely on assistive animals do not want their rights trivialized.

6. There is dissatisfaction with the Human Rights and Citizenship Commission and its complaint process. The complaint forms are complicated; the process is often seen as protracted; and the financial or other settlements are not considered effective as a deterrent. Participants indicated they would avoid filing a complaint because they lack confidence in the Commission; however, it appears that many are not necessarily well informed about the Commission's work. The CNIB and others are also concerned that the process takes place outside a court of law.

The title *Blind Persons' Rights Act* can be considered misleading as the *Act* focuses on guide dogs and the use of the white cane but does not include other rights, such as communication. Therefore, many of the persons contributing to the review stated a need to extend the act to include access to materials in Braille and teaching in Braille by a certified teacher. However, that issue is beyond the mandate of this review.

PROPOSED LEGISLATIVE FRAMEWORK

The following components of a framework are proposed to address the six issues and strengthen protection for persons with disabilities who rely on assistive animals.

Access to services

The fundamental purpose of the proposed legislation is to ensure access to services. Any person with a disability when accompanied by assistive animal (the team) must be entitled to the same access as any other person. Access here refers to gaining entry to public and commercial buildings and spaces and using "services". Services include shops, offices and facilities open to the public; public transportation; private operated transportation such as taxis, buses, trains and airplanes; accommodation in apartments, hotels, motels, and hostels; places of employment; and institutions such as schools, colleges, universities, polling stations and hospitals.

Terms and definitions

How will assistive animal be defined? Focus group participants agreed: an overly broad and inclusive definition of assistive animal or disability is an invitation to abuse and serves only to discredit people with a genuine disability who must rely on a well-trained assistive animal.

One of the submissions offered a definition of assistance animal drawn up by the Coalition of Assistance Dog Organizations (CADO). This definition or one very like it would be suitable in Alberta:

> Assistance animal means an assistance dog and includes other animals specifically trained to perform physical tasks to mitigate an individual's disability. Assistance dogs include: guide dogs that guide individuals who are legally blind, hearing dogs that alert individuals who are deaf or hard of hearing to specific sounds, and service dogs for individuals with disabilities other than blindness or deafness. Service dogs are trained to perform a variety of physical tasks, including but not limited to pulling a wheelchair, lending balance support, picking up dropped objects or providing assistance in a medical crisis. The presence of an animal for comfort, protection or personal defense does not qualify an animal as being trained to mitigate an individual's disability and therefore does not qualify said animal as an assistance animal.

The benefits to this type of a definition are that it avoids having to define disability; it clearly indicates who qualifies and it emphasizes the team: the dog and the person with a disability who needs that dog. This clarity is important in helping the service supplier – the airline check-in clerk, taxi driver, apartment manager, restaurateur – decide whether the team should have legitimate access to services.

Therefore it is proposed that the term, assistive animals, be used to apply to:

- Guide dogs that are trained to guide persons who are blind
- Service dogs that are trained to assist a physically disabled person in pulling a wheelchair, opening doors, retrieving objects, turning lights switches off and on, and other activities required by the individual
- Hearing alert dogs that are trained to assist a person who is deaf or hard of hearing
- Seizure alert dogs that are trained to alert a person when a seizure or diabetic episode is about to occur

The general term, assistive animal or assistive dog is used hereafter throughout this report to refer to all four categories of dog.

Assistive Animals Council

A council created by the government and located for budgeting purposes in the Community Support Systems Division of Community Development would be responsible for administering the legislation governing assistive animals.

The Council's director and staff would be responsible for conducting or contracting out services related to testing assistive animals and their users as a team, issuing identification cards, answering queries and dealing with complaints, and providing education and training.

Community involvement

To ensure the Assistive Animals Council is kept current and connected to the people it is intended to serve, a small advisory committee would be set up to guide the decisions of the Council and to bring trends, needs and issues to the attention of its staff. The committee would be made up of volunteer members appointed by the Minister of Community Development to represent a cross-section of groups around the province, such as taxi and restaurant associations, persons who use assistive dogs, and persons who train assistive animals.

The committee will also advise on matters such as the testing of assistance animals and the identification of training schools.

Identification

The legislation must make it easy for service suppliers to know that a team is legitimately entitled to access and that the assistive dog is a trained, working animal and not a pet. In many cases, the word of the person with a disability will be sufficient. However, to avoid access being denied, the framework proposes that the person with a disability using an assistive animal be required, if requested by a service supplier, to produce an identification card indicating that the team has successfully met the following criteria:

- the individual is dependent on the animal because of a disability
- the animal has performed to certain standards on a test designed to meet the specific requirements of its handler and ensure appropriate behaviour in a public place
- the testing has taken place in the previous five years

Other conditions should apply. For example, the assistive animal would have to be in a harness, the individual would have to assume responsibility for the animal's behaviour and any damage it causes, and the service supplier would have the option of asking the team to leave if the animal became sick, unruly or disruptive in any way. Service suppliers would be informed of the conditions through an in-depth, province-wide public education process.

Whenever suitable, as a matter of courtesy, individuals would be expected to give service suppliers advance notice that they will be accompanied by a dog. Examples include booking a taxi or hotel room and attending functions where special arrangements may be necessary.

Card Based on Test

As proposed here, the Assistive Animals Council would be responsible for overseeing the testing of the team and issuing the identification card. The testing could be contracted out to a panel of experts with knowledge about needs and the range of services the assistance animals can perform.

An individual would apply for a test for him or herself and the dog. The request could be made in writing or by telephone. Persons living in Edmonton and Calgary would be expected to travel to a testing site. In other areas, the examiner(s) could go to the individual's location or another designated site.

Onus on Individual

The team would be required to demonstrate that the dog could successfully and consistently perform the tasks required by the individual under different conditions and at different times. The test would be conducted every five years. If there were changes in the interim, for example if the dog were replaced, the individual would be expected to re-apply to be retested with the new dog. In other words, the card would only be granted to a team involving a fully trained dog able to pass the test. Dogs in training would not be eligible.

If the team fails the test, the Council would clearly identify the reasons for failure. The individual would be expected to re-apply once the shortcomings had been addressed. Therefore, the onus is on the person with the disability to ensure that the dog is suitably trained before applying for a card.

Not Considered Stigmatizing

The public education campaign would point out that the card is not intended to draw attention to the disability, but to facilitate access for the team and make decisions about entitlement easier for the service supplier.

The card would avoid stigmatization by not making reference to the disability. Therefore, it would be no more stigmatizing than the use of assistive animals, which are themselves highly visible and associated with having a disability.

Complaint and enforcement

In addition to testing and issuing identification cards, the Assistive Animals Council would answer queries and deal with complaints. The staff would be well versed in all related issues (human rights and other legislation, dog training, disabilities) to be able to advise the person about how to proceed (BPRA or HRCC).

The Council would investigate and be expected to inform the caller of its findings within a specified time, such as five working days. If a violation is confirmed, the Council would recommend mediation as a first option, bringing the parties together to seek a mutually agreeable solution. The intention would be to educate the offender about his or her legal obligations and seek assurance that there will not be further difficulties.

If the complainant prefers, or if the mediation fails, the complainant would have the option of laying charges against the service supplier. If the issue is more systemic in nature, the complainant may be advised to pursue the issue through the Human Rights and Citizenship Commission. In any case, the complainant would be aided through the different steps in these processes by staff of the Council.

Under the BPRA, anyone who poses as being entitled to access, or who fraudulently uses a white cane, will also be subject to charge. These complaints would also be brought to the attention of the Council, and staff would have the discretion to lay charges. It is proposed under this framework that fines for refusing access to certified teams not exceed $3,000. The penalty for the unauthorized use of a white cane is proposed to be a fine of $300.

Dogs in Training

Training schools would be required to apply for an identification card giving trainers and dogs in training access to public places and services such as transit. The schools would have to meet certain criteria and ensure all dogs wear a special jacket and harness.

As part of the public education, municipalities and businesses would be encouraged to give access to dogs in training so identified. Schools would have to apply to renew their identification card every three years. Renewal would be automatic provided no complaints had been received during that time.

Attacks by Other Dogs

Included in the legislation would be fines against dog owners whose animals attack assistive animals.

One of the first tasks of the Council and advisory committee would be to decide how to deal with cases where members of the public interfere with assistive animals; for example, by releasing it from its harness.

Balancing Rights

A second task that the Council and advisory committee would need to address is the issue of balancing the rights of those using assistive animals with the rights of other people, such as those will significant respiratory health conditions.

Public Education

The Assistive Animals Council would also be responsible for public education. Initially, Alberta Community Development should fund the public education campaign. However, the Council should also have the option of applying to other sources of funding such as the Human Rights, Citizenship and

Multiculturalism Commission Education Fund Advisory Committee.

It is proposed that education take several forms:

- **Awareness:** Once the proposed legislation is in place, informing the public, persons using a assistive dog, dog training schools, service suppliers and organizations representing these groups, about their obligations under the new law, how it will affect them (including the certification process) and the role of the Council.

- **Training:** Delivering training to specific groups or organizations about how to deal with assistive animals in the course of their work. Examples of the audiences include employees of a taxi company, hoteliers, and Restaurant and Food Services Associations.

- **Technical information and advice:** Informing individuals or organizations regarding the details of the complaint process, dog training and certification, and supporting persons who wish to lay a charge.

- **Sensitivity awareness:** Providing general information or training (to school children, community groups, business leaders, employers) directed at increasing understanding of and sensitivity towards persons with disabilities who use assistive animals.

- **Advocacy:** Informing government policy makers and others whose decisions affect persons with disabilities who use assistive animals, about emerging trends, needs and issues.

RECOMMENDATIONS

It is recommended that the Minister of Community Development:

1. Retain the *Blind Persons' Rights Act* with the following amendments:

   - Revise and update the definition of blindness by removing the references to Alberta government pension and the CNIB.
   - Remove references to guide dogs.
   - Increase current fines for misuse of a white cane.

   Rationale:

   The definition of blindness would be consistent with other jurisdictions.

   Protection is preserved for persons using a white cane.

   The BPRA can be added to in future if blind persons are awarded more rights.

   The provisions governing the use of a guide dog are more efficiently administered in a single piece of legislation that applies to all assistive animals.

2. Develop a new piece of legislation called the *Assistive Animals Act*, features of which include:

   - A definition of assistive animal, similar to the one developed by the Coalition of Assistance Dog Organizations, which refers to animals "specifically trained to perform physical tasks to mitigate an individual's disability and includes guide dogs, hearing dogs, and service dogs, but not animals for comfort, protection or personal defense".

- Regulations referring to:
  - an Assistive Animals Council made up of paid staff responsible for administering the legislation
  - a volunteer advisory committee, consisting of members appointed by the Minister of Community Development, to represent a cross-section of stakeholders, with the primary role of offering information to guide the decisions of the Council
  - a photo identification card intended to facilitate access, issued to the team (user and animal) based on successful completion of a test and the demonstrated ability to meet specific criteria
  - a complaint and enforcement process wherein the Council advises complainants, conducts investigations within a specified time, and seeks a mediated solution wherever possible

- Provision for a complainant or the Assistive Animals Council to lay charges against a person or organization denying access to an assistive animal

- Fines to be levied against a service supplier for denying access to a certified assistive animal

- A clause indicating that the legislation will be reviewed in five years as a way of monitoring its effectiveness and ensuring the legislation remains current, particularly with regard to the definition of assistive animal

The power to establish and amend the regulations rests with the Minister of Alberta Community Development on the advice of the Assistive Animals Council.

Rationale:

The proposed legislation responds to the increased use of assistive animals by people with

a disability and their need for access to public and commercial places and services when accompanied by their animals.

The proposed legislation strengthens protection for **all** persons with disabilities who use an assistive animal.

The use of volunteers on the advisory committee gives a voice to stakeholders and helps to ensure the regulations are relevant and workable.

The emphasis is on public education and training (see below) and mediation; however, there is provision for bringing charges in extreme cases or with repeat offenders.

3. Design and implement a public education campaign with the purposes of heightening public awareness of the need for assistive animals; informing Albertans of the changes to the legislation; and advising service suppliers, users of assistive animals and animal trainers of their respective responsibilities under the law.

4. Amend the *Human Rights, Citizenship and Multiculturalism Act* and other provincial acts to incorporate "assistive animal" as appropriate.

5. As a first step in implementation, appoint an interim director to establish the Assistive Animals Council and the Advisory Committee and put the procedures in place.

   Once this is completed, hire a permanent director using a process that involves the Advisory Committee.

6. Advise the Minister of Learning of the findings of this public consultation with regard to Braille rights: the wish for persons who are blind to have access to educational and other materials in Braille and classroom teaching by a certified teacher of Braille.

SUMMARY OF MEDIA COVERAGE

Media	Location	Reporter/Producer/Writer	Approximate Date
Lethbridge Herald	Lethbridge	Dave Shultz	30 October
Grande Prairie Herald-Tribune	Grande Prairie	Deb Guerette	30 October
Arnet Report	Edmonton	Jim Arnet	2 November
Alberta Scan	Edmonton		2 November
QR77 Radio (Alberta Weekend Morning Show)	Provincial	Peter Watts	3 November
St. Alberta Gazette	St. Albert	Tara Norton	3 November
Medicine Hat News	Medicine Hat	James Wood	2 November
Grande Prairie Herald-Tribune	Grande Prairie	Scott Seymour	10 November
Edmonton Journal	Edmonton	Bob Gilmour/Larry Wong	14 November
CFRN-TV	Edmonton	Rob McKechnie	13 November
CBC Radio	Edmonton	Pam Petrin	14 November
Mayerthorpe Freelancer	Mayerthorpe	George Vanderburg, MLA	14 November
Voice Print	Provincial	Lynne Rach	27,28,29,30 November, 1 December
Red Deer Advocate	Red Deer	Penny Caster	23 November
Wetaskiwin News	Wetaskiwin	Paris Engram	Not known
Rocky View Weekly	Rocky View	Carol Haley, MLA	20 November
CKRD Radio	Red Deer	Not known	22 November
CKGY Radio	Red Deer	Lorne Starko	22 November
CFCN-TV	Calgary	Alyssia Carpenter	23 November
Channel 7 News	Calgary	Shooter	23 November
CHAT Radio	Medicine Hat	Brian Conrad	26 November
CHQR Radio (Rutherford Show)	Provincial	Solange Nicholson (P)	27 November
Calgary Sun	Calgary	Nova Pearson	27 November
Edmonton Journal	Edmonton	CNIB Letter	2 December
Lethbridge Herald	Lethbridge	Lisa Sicluna	4 December
Calgary Herald	Calgary	Naomi Lakritz	6 December
Arnet Report	Edmonton	Jim Arnet	Not known
Edmonton Journal	Edmonton	Liz Craig, Red Deer, Letter	10 December

SUBMISSIONS BY ORGANIZATIONS

1. Alberta Association of Optometrists
2. Alberta Birds of Prey Centre
3. Alberta College of Optometrists
4. Alberta Disabilities Forum
5. Alberta Human Resources & Employment, Red Deer
6. Alberta Human Rights and Citizenship Commission
7. Alberta Seniors
8. Alberta Society for the Visually Impaired, Calgary
9. The Alberta Teachers' Association
10. Associated City Cabs, Red Deer
11. Bow Valley College, Calgary
12. Calgary & Edmonton Pet Expos
13. Calgary Police Service.
14. Canadian Council of the Blind, Alberta Division
15. Canadian Council for the Blind, Red Deer
16. Canadian Hard of Hearing Association
17. Canadian Mental Health Association.
18. Canadian National Institute for the Blind National Board of Directors
19. Canadian National Institute for the Blind, Alberta – NWT – Nunavut Division
20. Canadian National Institute for the Blind, Calgary
21. Canadian National Institute for the Blind, Calgary
22. Canadian National Institute for the Blind, Edmonton
23. Canadian National Institute for the Blind, Edmonton
24. Canadian National Institute for the Blind, Grande Prairie
25. Canadian National Institute for the Blind, Lethbridge
26. CNIB Library for the Blind, Canadian Braille Authority
27. Canadian Restaurant Association
28. Champions Career Centre, Calgary
29. City of Calgary Transit, Accessible Transportation Services
30. City of Edmonton, Animal Control Services
31. City of Edmonton Community Services
32. City of Edmonton Transit System
33. City of Grande Prairie Recreation, Culture & Facilities
34. City of Grande Prairie Transit
35. City of Lethbridge Housing
36. City of Red Deer
37. Demong Associates Eye Centre, Calgary
38. Disabilities Unlimited Fellowship Society, Edmonton
39. Disability Resource Centre, University of Calgary
40. Edmonton Guide Dog Users Group
41. Edmonton Public Schools
42. Edmonton Public Schools
43. Edmonton Public Schools
44. Edmonton Public Schools
45. Epilepsy Association of Calgary
46. Glenora Physiotherapy Clinic, Edmonton
47. Grande Prairie & District Association for the Mentally Handicapped
48. Grande Prairie Regional Tourism Association
49. Grande Spirit Foundation, Grande Prairie
50. Guide Dog Support Group, Calgary
51. Guiding Eyes Organization
52. Independent Living Resource Centre, Calgary
53. Ka'Na'Ta Sight and Service Dogs, Edmonton.

54. Lethbridge Hotel/Motel Association
55. Lethbridge Police Service
56. Lions Club, Edmonton
57. Lions Club, Lethbridge
58. Lions Club, Red Deer Central
59. Lions Foundation of Canada
60. Markaz-Ul-Islam Society of Edmonton
61. The National Federation of the Blind: Advocates for Equality, Kelowna, BC
62. Office for Disability Issues, Victoria, BC
63. Optometrists Clinic Inc.
64. Pacific Assistance Dog Society, Calgary/Burnaby
65. Peace Region EmployAbilities Services
66. Queen Elizabeth II Hospital, Mistahia Region
67. RCMP, Red Deer
68. Red Deer Action Group Handi Bus
69. Red Deer College
70. The Sir Arthur Pearson Association of War Blinded
71. Smokey's Assistance Dogs Foundation, Edmonton
72. Transit, Community Services Division, Lethbridge
73. Treaty 7 Co-Management
74. Western Guide Dog Foundation
75. The World Blind Union of North America/Carribean Regions

INTERVIEWS AND SPECIAL MEETINGS

1. Alberta Committee of Citizens with Disabilities
2. Alberta Hotel & Lodging Association
3. Alberta Restaurant & Food Services Association
4. Apartment Owners Association, Calgary
5. Apartment Owners Association, Edmonton
6. Calgary Taxi Commission
7. Canadian National Institute for the Blind
8. Edmonton Taxi Cab Commission
9. Landlord & Tenant Advisory Board
10. Restaurant & Food Services, Calgary
11. Western Guide Dog Foundation